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Framing China's Rule of Law: A Comparative Corpus-Based Analysis of Legal News in People's Daily Online and The Guardian

Zhuoyu Li*
School of English for International Business, Guangdong University of Foreign Studies, China
***Corresponding author, E-mail: 2662383178@qq.com**

Abstract
This paper compares how China is framed in English-language legal news in two outlets with markedly different institutional positions: People's Daily Online and The Guardian. The data cover January 2025 to February 2026 and amount to around 945 thousand and 1.4 million words respectively. Building on Goffman's framing theory and on transitivity analysis from Systemic Functional Linguistics, the study classifies the verbal collocates of China by process type and reads the resulting patterns as outlet-level frame packages, which are then mapped onto Entman's three framing dimensions. The two packages prove to be structurally inverse. In People's Daily, China appears as the destination of legal-institutional construction and as an active partner in multilateral reform; in The Guardian, the same actor is positioned as a target of external regulation and as an agent whose initiatives prompt containment by others. The opposition holds across all three of Entman's dimensions. The study makes two contributions. Theoretically, the paper offers a bottom-up way of operationalizing frame theory: frames are inferred from grammatical choices rather than from preset categories. Methodologically, the study shows that transitivity choices can carry frame divergence independently of evaluative tone, and that grammatical-role analysis can recover such divergence where surface evaluation registers convergence.

Keywords:
frame analysis; transitivity; comparative corpus analysis; China's rule of law

1 Introduction

The way a country is represented in international news has consequences that reach well beyond the news text itself. A growing body of research indicates that media framing is not merely a stylistic dimension of reporting but one of the primary mechanisms through which readers form judgments about governments, institutions, and foreign states — whether the issue at hand is partisan coverage of pandemic responses (Lee, 2025) or comparative coverage of crisis management across Asian states (Jo & Chang, 2020). On this view, the framing of a particular country by international media, and the question of whether competing outlets produce compatible or structurally divergent accounts, becomes central to understanding international communi-

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cation.

China has been a recurring case within this literature. Comparative work spans the political, economic, technological, and environmental domains (Tang & Shi, 2018; Pei & Cheng, 2024; Soboleva, 2025), and a consistent finding has emerged: Western and Chinese outlets construct substantially different accounts of the same country. The legal domain, however, has received considerably less attention, and this gap is consequential for two related reasons. First, unlike economic or technological reporting, in which competing outlets at least share a common empirical referent, legal discourse is organized around a normatively contested concept whose definition divides Western and Chinese institutional traditions (Stockmann & Gallagher, 2011; Ge, 2016). Therefore, if frame packages diverge structurally anywhere, the legal domain is where such divergence should be most apparent. Second, legal news constitutes a demanding test site for the central claim that frame divergence can be encoded in grammar independently of evaluative tone (Ge, 2016; Yu & Luo, 2023). Both Chinese and Western legal coverage tend to operate in a procedural, institutional register rather than in overtly appraising language; recovering structurally inverse frame packages from this surface uniformity therefore provides demanding rather than convenient evidence.

The present study addresses this gap by examining English-language legal news in two outlets occupying markedly different institutional positions: People's Daily Online, China's official outlet for international audiences, and The Guardian, a British broadsheet with substantial global readership. The analysis combines media framing theory (Entman, 1993; Reese, 2007) with transitivity analysis from Systemic Functional Linguistics (Halliday & Matthiessen, 2013). Drawing on two large-scale corpora covering June 2025 to February 2026, the study examines the verbal collocates of China in order to determine how each outlet positions it.

Two research questions guide the analysis:

Research question 1: How do People's Daily Online and The Guardian frame China in legal news through their transitivity choices?

Research question 2: To what extent do the resulting frame packages constitute structurally divergent accounts of China's legal-political legitimacy in international communication?

2 Literature Review

2.1 Framing as Analytical Lens

The conceptual basis for treating media texts as constructive rather than descriptive is established in Goffman's (1974) Frame Analysis. Goffman argues that individuals do not interpret experience directly but through shared organizing schemata — frames — that render events meaningful. Frames in this account are intersubjective and contestable: actors who select and sustain particular frames do not so much describe social reality as participate in producing it.

Entman (1993) brings this insight into media analysis, defining framing as the selection of certain aspects of a perceived reality and the rendering of these aspects more salient in a text, thereby promoting particular problem definitions, causal interpretations, and moral evaluations. Reese (2007) further consolidates framing

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as a bridging analytical model that links textual structure with interpretive effect. Framing research has nevertheless faced persistent operationalization difficulties: systematic reviews identify a lack of operational precision and an over-reliance on top-down, researcher-defined frame categories as recurrent problems (Matthes, 2009; de Vreese, 2005) — a difficulty addressed in Section 2.3.

The cognitive consequences of framing choices are well documented. Scheufele (1999) shows that media supply the interpretive frameworks through which audiences make sense of public events, while Chong and Druckman (2007) demonstrate that even subtle shifts in issue presentation alter the evaluative weight individuals assign to particular considerations. Whereas agenda-setting determines issue salience, framing shapes how issues are interpreted (Scheufele & Tewksbury, 2007), and this distinction is particularly relevant for understanding how audiences form judgments about foreign nations, given that readers depend heavily on media as their primary source of knowledge in this area (McCombs & Shaw, 1972).

Since perceptions of foreign nations are largely mediated through systematic framing choices (Wanta et al., 2004), and since framing-induced divergence persists even under cross-cutting exposure (Chong & Druckman, 2007), examining how competing outlets construct frames of the same foreign actor becomes central to international public opinion formation.

2.2 Divergent Media Framing of China and Their Implications

Research on how international media construct China has developed into a well-established interdisciplinary field. Scholars have shown that media representations of China follow systematic patterns across domains such as politics, economy, and environment (Tang & Shi, 2018; Ma & Cui, 2020).

A consistent finding is that Western and Chinese outlets frame China in fundamentally divergent terms. Western media regularly draw on lenses of conflict, threat, and ideological contestation: coverage of 5G constructs China as a geopolitical rival through risk-laden adversarial language (Pei & Cheng, 2024); reporting on the Social Credit System portrays it as authoritarian surveillance incompatible with liberal values (Xu et al., 2025); and Western international news more broadly relies on conflict and responsibility-attribution frames that position foreign governments — China prominently among them — as sources of instability (Soboleva, 2025). Chinese outlets, by contrast, foreground cooperation, development, and mutual benefit (Pei & Cheng, 2024; Soboleva, 2025). These divergent tendencies can be productively read through strategic narratives (Miskimmon et al., 2014), which conceptualizes media discourse as a vehicle through which institutions advance competing frames of international order, identity, and legitimacy. The contrast between Western adversarial framing and Chinese developmental framing thus reflects a sustained contest over which account of China gains international purchase.

These patterns carry direct implications for international perceptions. Where outlets serving different audiences select systematically different aspects of the same foreign actor, the resulting evaluative divergence is not transient bias but a stable feature of mediated perception (Wanta et al., 2004; Brewer et al., 2003). The structural question that follows — whether competing outlets present complementary perspectives that audiences could combine, or incompatible accounts that they could not — therefore bears directly on whether international audiences arrive at compatible judgments.

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2.3 Measuring Media Framing: A Corpus-Based Approach

Systematic comparison of media framing requires an approach capable of handling large volumes of text while limiting researcher subjectivity, and corpus-based methods are well suited to this requirement. Baker (2023) argues that corpus linguistics, governed by the principle of total accountability — that is, accounting for all instances of a linguistic phenomenon rather than selectively citing convenient examples — enables exhaustive and replicable analysis. It also surfaces frequency patterns that intuition alone is unlikely to detect, thereby constraining the cognitive biases that often accompany small-sample close reading.

Quantitative corpus tools alone, however, do not yield interpretation. Subsequent research has shown that quantitative patterns acquire interpretive value only when triangulated with concordance-level qualitative analysis (Baker & McEnery, 2005; Baker et al., 2008), and that linguistic choices in media texts are best treated as instances of universally situated meaning construction rather than neutral selections (Fairclough, 2003).

Within this broader framework, transitivity analysis — drawn from Systemic Functional Linguistics (Halliday & Matthiessen, 2013) — provides a systematic analytical tool for capturing media framing choices. By identifying who acts, who is acted upon, and what processes are attributed to each participant, transitivity analysis renders visible the agency configurations through which actors are positioned in text (Chen & Chen, 2023; Du et al., 2025). Recent work in this vein has applied transitivity analysis to the construction of China's self-projected image in single-source diplomatic discourse (Du et al., 2025), demonstrating the framework's analytical purchase but leaving unaddressed the comparative question of how transitivity choices diverge across institutionally opposed outlets covering the same actor. This grammatical dimension maps directly onto Entman's (1993) framing dimensions: the choice of who acts and who is acted upon textually instantiates the agency configuration of the situation, while the distribution of process types across participants encodes problem definitions, causal interpretations, and moral evaluations at the level of grammar itself.

Transitivity analysis thus functions as the operational instrument of framing theory in the present study, providing a systematic, bottom-up means of capturing the selective choices that framing identifies as its representational mechanism — and thereby addressing the operationalization challenge raised in Section 2.1.

2.4 Research Gaps

Three gaps emerge from the foregoing review. First, existing comparative studies have concentrated on the political, economic, and environmental domains (Liu & Li, 2017; Highhouse, 2022; Wang et al., 2024; Du et al., 2025), with legal news receiving comparatively little systematic attention. This is a consequential omission, given that legal discourse is precisely the site where international audiences form judgments about institutional credibility and governing legitimacy (Ge, 2016; Fan, 2019; Yang & Zou, 2025).

Second, the outlet pairing examined in the present study has received limited systematic attention in prior research. People's Daily Online — designed explicitly for international audiences and thus a direct instrument of China's external communication — remains underexamined in comparative framing scholarship, and its parallel position with The Guardian constitutes an analytically productive comparison.

Third, although transitivity analysis has been applied to news discourse, its potential as a bottom-up means

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of operationalizing framing theory has rarely been articulated in theoretical terms, leaving the integration of these two traditions undertheorized.

To address these gaps, the present study undertakes a comparative corpus-based analysis of how People's Daily Online and The Guardian frame developments in China's rule of law. By examining the transitivity patterns through which each outlet positions China — as agent of governance or as object of regulation and contestation — and interpreting these patterns through Entman's three framing dimensions, the study aims to contribute (1) a methodologically integrated framework that operationalizes framing theory through transitivity analysis, and (2) empirically grounded insights into how legal news constructs competing accounts of China's legal-political legitimacy in international communication.

3 Research Design

3.1 Research Design and Analytical Framework

The present study adopts a corpus-based frame analysis to compare how People's Daily Online and The Guardian frame China in English-language legal news. The central concern is how each outlet positions China's agency in legal and governance contexts — whether as an active and legitimate actor, or as a passive object of regulation and contestation. To operationalize framing theory at scale, the study draws on transitivity analysis from Systemic Functional Linguistics (Halliday & Matthiessen, 2013), which identifies the grammatical process types associated with each participant in a clause. Transitivity thus offers a replicable, bottom-up means of capturing the selective choices that framing identifies as its representational mechanism (Matthes, 2009).

3.2 Corpus Design and Data Collection

Two corpora were constructed to enable systematic comparison. The first comprises English-language legal news drawn from People's Daily Online, China's official English-language outlet aimed at international audiences. The second comprises China-related legal news drawn from The Guardian, a major British broadsheet with substantial international readership. Articles were retrieved through a Python web scraper that extracted titles and full body text, covering the period from January 2025 to February 2026. For inclusion, each article was required to contain the term "China" together with at least one legal or judicial keyword (rule of law, judicial, legal, legislation, court, etc.). Complete sampling was applied to both sources within these parameters in order to eliminate selection bias, yielding a People's Daily corpus of 6,648,282 tokens (2151 articles, 945,139 words) and a Guardian corpus of 8,535,171 tokens (1114 articles, 1,386,589 words). For cross-corpus frequency comparisons, counts are normalized to instances; within-corpus proportional analyses are computed on raw frequencies.

3.3 Analysis Procedure

Verbal collocates of China were extracted using AntConc 3.5.8 within a five-word window on either side of the node, with retention restricted to items with raw frequency ≥ 20 and mutual information ≥ 3 (Hunston, 2002). Items to the left (L5) correspond to processes targeting China, those to the right (R5) processes China

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itself enacts; since span position fixes China's participant role, the two were analyzed in parallel.

Retained items were lemmatized and each instance assigned to one of the six process types in Halliday and Matthiessen (2013); for verbs admitting competing readings, twenty random lines informed the decision. The non-China participant's institutional affiliation (Chinese or foreign) and the process's evaluative orientation were coded in tandem. A second SFL-trained coder re-coded 80% lines per verb, yielding Cohen's $\kappa = 0.76$ (95% CI: 0.68, 0.84), indicating substantial agreement (Landis & Koch, 1977).

Verbs were aggregated into framing devices on three converging criteria — participant configuration, affiliation, and evaluative orientation — with divergence on any one separating them even where process type was shared (e.g., Verbal processes attributed to Chinese versus foreign sources). A device's weight was its verbs' cumulative frequency over the span's total retained-collocate frequency.

The L5 and R5 devices in each corpus were finally read as that outlet's frame package and aligned with Entman's (1993) three dimensions. Since Entman conceives of frames as constituted through selection against alternatives, two packages were judged structurally inverse where, on each dimension, readings contrasted by one outlet were those occluded by the other (see Section 4.3).

4 Research Findings

Across the retained collocates in the two corpora (Tables 1–4), the process types observed are confined to Material, Verbal, and Mental; no instances of Relational, Behavioral, or Existential processes met the retention thresholds in either corpus. The analysis that follows therefore proceeds on the basis of the three process types empirically attested in the data.

4.1 People's Daily: A Frame of Developmental Agency and Multilateral Engagement

The L5 collocates (Table 1) reveal four framing devices that together position China as recipient. The Material cluster comprising build (96) and inspect (37), at 31.7% of the L5 frequencies, frames China as the goal of legal development: China occupies the Goal slot while legal-developmental processes are directed towards it ("fully building China into a strong country"). The Verbal cluster of add (60), note (58), and brief (25), at 34.0%, frames China as the topic of authoritative articulation; the Sayers are themselves Chinese officials, so Verbal processes about China operate as channels of institutional self-articulation rather than third-party reporting. The cluster of laud (45) and welcome (35), at 19.1%, frames China as an exemplar of rule-of-law practice through evaluative Verbal and Material processes whose appraisers are international actors (Thai and Malaysian legal representatives); legitimation is thereby externalized, conferred by peers rather than asserted by China itself. The Mental cluster of understand (32) and learn (32), at 15.2%, frames China as the object of cognitive uptake, with international actors as Sensers seeking access to Chinese ideas and experience.

The R5 collocates (Table 2) extend this logic through four initiator-side devices. The Material cluster of meet (97) and attend (32), at 35.7%, frames China as a partner in multilateral engagement: the participant configurations are symmetrical and institutionally embedded, construing China's agency as horizontal cooperation. Open (51) and promote (82), at 36.8%, frame China as an advocate of systemic reform, with Goals that are structural conditions ("growth", "reforms", "the rule of law in international relations"). Publish (27)

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and issue (32), at 16.3%, frame China as a voice of institutional authority, where the selection of Material rather than Verbal processes constructs textual production (white papers, governance compilations) as substantive institutional action. Continue (20) and aim (20), at 11.1%, frame strategic continuity, projecting China's actions onto a sustained future trajectory ("continue strengthening its friendly ties", "aims to improve protection").

Read across the two spans, these eight framing devices cohere into a single frame package in Entman's (1993) sense. The L5 side foregrounds affirmative reception, China is built towards, articulated through, recognized by, and learned from; while the R5 side foregrounds constructive initiative: engagement, reform, authority, and continuity. On problem definition, rule-of-law work is rendered as a developmental and cooperative undertaking; on causal interpretation, outcomes are traced to China's own initiative and to symmetrical multilateral engagement, with external pressure correspondingly foreclosed; on moral evaluation, the orientation is consistently affirmative. The cross-span coherence of this configuration is consistent with the kind of strategically projected representation through which institutions advance preferred accounts of identity and order (Miskimmon et al., 2014).

Table 1: Transitivity Analysis of High-Frequency L5 Collocates of China (People's Daily)

Process	Verb	Raw Frequency	Normalized Frequency per Million Words	Article Frequency (%)	Examples
Material	build	96	101.57	85(3.95%)	...are of great significance to fully **building** China into a strong country...
Material	inspect	37	39.15	32(1.48%)	Xi **inspected** southwest China's Chongqing Municipality from Monday to Tuesday...
Verbal	add	60	63.48	56(2.60%)	Huo said, **adding** that China's need to further promote reforms through opening-up...
Verbal	note	58	61.37	42(1.95%)	Xi **noted**, adding that China should actively take part in the formulation of international rules...
Verbal	brief	25	26.45	21(0.98%)	He Rong **briefed** the delegation on China's historic achievements in promoting overall law-based governance...
Verbal	laud	45	47.61	26(1.21%)	Legal and judicial representatives from Thailand and Malaysia **lauded** China's achievements...
Material	welcome	35	37.03	14(0.65%)	...hosted a banquet at the Great Hall of the People in Beijing to **welcome** guests...
Mental	understand	32	33.86	30(1.53%)	...helping people further **understand** China's ideas and proposals...
Mental	learn	32	33.86	24(1.11%)	...understand the latest development of the CPC's thoughts on state governance and **learn** from China's experience...

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Note. L5 = a five-word span to the left of the node word China. Verbs were retained where raw frequency ≥ 20 and mutual information score ≥ 3 (Hunston, 2002).

Table 2: Transitivity Analysis of High-Frequency R5 Collocates of China (People's Daily)

Process	Verb	Raw Frequency	Normalized Frequency per Million Words	Article Frequency (%)	Examples
Material	meet	97	102.63	61 (2.84%)	China's Minister of Justice He Rong (R) **meets** with To Lam, Vietnamese minister of public security...
Material	attend	32	33.86	30 (1.39%)	...He Rong **attended** an open meeting of justice ministers of the 12th St. Petersburg International Legal Forum...
Material	open	51	53.96	48 (2.23%)	...his visit to China was intended to **open** the door to opportunities for Finnish businesses...
Material	promote	82	86.76	78 (3.63%)	China's overall development and **promote** high-quality growth...
Material	publish	27	28.57	16 (0.74%)	A compilation of excerpts from discourses on community-level governance by Xi Jinping... has been **published**...
Material	issue	32	33.86	29 (1.35%)	China on Tuesday **issued** a white paper on building a global community of shared future...
Material	continue	20	21.16	84 (3.91%)	China's Ministry of Justice (MOJ) is willing to **continue** strengthening its friendly ties with Vietnam...
Material	aim	20	21.16	15 (0.69%)	...China **aims** to improve protection of the rights and interests of maritime passengers...

Note. R5 = a five-word span to the right of the node word China. Retention thresholds and abbreviations follow Table 1.

4.2 The Guardian: A Frame of Regulatory Subjection and Contested Agency

The L5 collocates (Table 3) yield four framing devices that position China in fundamentally different terms. The Material cluster of impose (44) and send (24), at 25.3% of the L5 frequencies, frames China as the target of external regulation: foreign governments occupy the Actor slot, with Goals that impinge on China ("If the US continues to impose tariffs on Chinese goods", "send these people to China"). Ban (20), at 7.4%, extends the regulatory pattern through prohibitive Material processes ("banned from export to China"). The Verbal cluster of accuse (84) and describe (48), at 49.1%, frames China as the target of evaluative categorization; the Sayers are foreign (defense departments, foreign officials), so definitional content about China is assigned externally rather than asserted by China itself. The remaining 18.2% is contributed by travel(49), which frames China as a destination of diplomatic engagement and carries a positive evaluative orientation ("warming relations after Keir Starmer travelled to Beijing"); its marginal weight against an L5 profile dominated by regula-

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tory and adversarial framing, however, marks it as a peripheral counterweight.

The R5 collocates (Table 4) at first appear to grant China substantial agency, but each device embeds that agency within adversarial contexts. The Material cluster of impose (60) and build (51), at 26.8%, frames China as an agent of unilateral enforcement and contested construction: although China occupies the Actor slot, the Goals are coercive ("severe penalties on drug-related crimes") or negated within hostile syntactic environments ("ensuring that China can never build military bases closer to Australia"). The Verbal cluster of talk (74), claim (54), and accuse (50), at 43.0%, frames China as an articulator within adversarial discourse, with the collocational profile foregrounding contestation ("talk tough", "claim Taiwan as its own territory", "accused Washington of 'blackmail'"); the selection of these verbs over neutral alternatives forecloses readings in which Chinese articulation might appear as ordinary diplomatic communication. Announce (70) and agree (55), at 30.2%, frame China as a party to institutional negotiation, but the events selected are revealing: announcements concern retaliatory tariff increases, and agreements concern a "trade truce" requiring restoration: cooperative acts are thus presented as temporary suspensions of an underlying contest.

Read across the two spans, these seven devices cohere into a frame package whose configuration along Entman's three dimensions inverts that of Section 4.1. On problem definition, China is rendered as a source of regulatory, security, and discursive contestation; on causal interpretation, agency is distributed between external regulators (imposing, banning) and a China whose initiatives cause containment responses, with constructive initiative correspondingly foreclosed; on moral evaluation, the orientation is predominantly critical or adversarial, and the one device with warmer valence (travel, 9.8%) is marginal in weight. Sustained at this scale, the configuration exemplifies the kind of strategically projected representation through which competing accounts of international order are advanced (Miskimmon et al., 2014), directly opposed to the package identified in Section 4.1. As shown in Table 5, the Guardian corpus demonstrates a stronger concentration of verbal processes associated with accusation, claim-making, and political positioning, whereas material processes frequently encode contested actions and institutional responses.

Table 3: Transitivity Analysis of High-Frequency L5 Collocates of China (The Guardian)

Process	Verb	Raw Frequency	Normalized Frequency per Million Words	Article Frequency (%)	Examples
Material	travel	49	17.31	39 (3.50%)	...a significant sign of warming relations after Keir Starmer **travelled** to Beijing for landmark talks...
Material	impose	44	31.73	38 (3.41%)	...If the US continues to **impose** tariffs on Chinese goods exported to the US, China will ignore it,"...
Material	send	24	17.31	19 (1.71%)	..."It's shameful for Thailand to **send** these people to China...
Verbal	accuse	84	60.58	50 (4.49%)	Australia's defence department **accused** the Chinese navy of an "unsafe and unprofessional" incident...

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Verbal	describe	48	34.62	31 (2.78%)	His foreign minister, Wang Yi, went as far to **describe** China as an anchor in an increasingly uncertain world...
Material	ban	20	14.42	19 (1.71%)	...although they were also **banned** from export to China last October...

Note. Abbreviations and retention thresholds follow Table 1.

Table 4:Transitivity Analysis of High-Frequency R5 Collocates of China (The Guardian)

Process	Verb	Raw Frequency	Normalized Frequency per Million Words	Article Frequency (%)	Examples
Material	impose	60	43.27	29 (2.60%)	China always **imposes** severe penalties on drug-related crimes and maintains a 'zero tolerance' attitude...
Material	build	51	36.78	30 (2.69%)	...ensuring that China can never **build** military bases closer to Australia...
Verbal	talk	74	53.37	29 (2.60%)	While officials in Canada, Europe and China **talk** tough, the response in Australia has been more muted...
Verbal	claim	54	38.94	39 (3.50%)	China **claims** Taiwan as its own territory and intends to annex it under what it terms "reunification"...
Verbal	accuse	50	36.06	33 (2.96%)	China's commerce ministry **accused** Washington of "blackmail" and said Trump's threats of steeper tariffs...
Verbal	announce	70	50.48	42 (3.77%)	China **announced** it would increase its retaliatory tariffs on US goods to 125%...
Verbal	agree	55	39.67	27 (2.42%)	US and Chinese officials **agreed** on a framework to get their trade truce back on track...

Note. Abbreviations and retention thresholds follow Table 1.

Table 5: Distribution of Process Types among High-Frequency China Collocates

Corpus	Span	Material Process	Verbal Process	Mental Process	Total
People's Daily	L5	168 (40.00%)	188 (44.76%)	64 (15.24%)	420
People's Daily	R5	361 (100.00%)	0 (0.00%)	0 (0.00%)	361
The Guardian	L5	112 (45.90%)	132 (54.10%)	0 (0.00%)	244
The Guardian	R5	111 (26.81%)	303 (73.19%)	0 (0.00%)	414

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4.3 Divergent Frames and the Contest for Legal Legitimacy

The two outlets differ not only in verb selection but in the structural organization of their frame packages, and this opposition is most clearly displayed by aligning Entman's three dimensions (Table 6).

The inversion is structurally complementary: each framing move in one package selects against the readings contrasted by the other. Where People's Daily systematically denies readings of China as constrained or contested, The Guardian systematically precludes readings of China as developmental or cooperatively engaged. The two frame packages are thus not partial perspectives that audiences might combine, but mutually displacing accounts of what China is as a legal-political actor.

Two grammatical pairs make this inversion concrete and preclude the interpretation that it is merely an artefact. The first is build. The verb appears as a high-frequency collocate in both corpora, but occupies opposite slots: in People's Daily it is an L5 Material process with China as Goal of development ("fully building China into a strong country", 96 occurrences); in The Guardian it is an R5 Material process with China as Actor, repeatedly negated within hostile syntactic environments ("ensuring that China can never build military bases closer to Australia", 51 occurrences). The same lexical resource therefore enacts development on one side and prohibited construction on the other—a contrast that resides not only in verb choice but also in the grammatical role assigned to China. The second pair concerns the Sayer slot of Verbal processes about China. Both outlets place Verbal processes at the head of their retained frequency distributions (People's Daily 34.0% with add, note, brief; The Guardian 54.1% with accuse, describe), but they fill the Sayer slot with opposite institutional affiliations: Chinese officials in the first case, foreign actors in the second. In this case, the right to articulate China is distributed by grammar rather than asserted by tone.

These pairs point to a deeper divergence in the legitimacy that each frame presupposes. People's Daily locates legitimacy in performance and recognition: China's national status is established by what an actor builds, promotes, and issues, and by the affirmation of international peers who laud and learn from it. The Guardian locates legitimacy in rule-based external accountability: China's national status is conferred not by an actor's own conduct but by whether that conduct withstands the scrutiny of regulators, allies, and treaty partners. The logic extends even to ostensibly cooperative acts: in the R5 announce/agree cluster (30.2%), agreements concern a "trade truce" whose restoration is itself in doubt, so that cooperation registers in the text not as standalone evidence of partnership but as a temporary suspension of an underlying contest. Cooperation, on this construction, is conditionalized—and the condition is external review. Because this divergence is carried by transitivity choices rather than by evaluative tone, it is also harder to recognize and harder to resist. Tonal bias has a public vocabulary: readers can describe a report as "inflammatory" or "one-sided". The grammatical question of who occupies the Actor slot, by contrast, falls outside ordinary critical reading. Audiences anchored in either outlet are therefore exposed not to a biased version of a shared environment but to one of two structurally incompatible accounts, and the framing-induced divergence between them is unlikely to dissolve under cross-cutting exposure (Chong & Druckman, 2007).

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Table 6: The Two Frame Packages along Entman's Three Dimensions

Framing Dimension	People's Daily	The Guardian
Problem definition	Rule of law as developmental, cooperative undertaking	China as source of regulatory, security, and discursive contestation
Causal interpretation	Progress driven by China's own initiative and multilateral engagement	Outcomes produced by external regulation
Moral evaluation	Affirmative — China lauded, welcomed, learned from	Critical — China accused, regulated, contested

5 Conclusion and Discussion

This study has examined how People's Daily Online and The Guardian frame China in English-language legal news, drawing on a corpus-based analysis that integrates transitivity theory with Entman's framing dimensions. The two outlets are shown to articulate structurally inverse frame packages: People's Daily projects developmental agency and multilateral engagement, whereas The Guardian frames China as subject to regulation and as a contested agent, with each outlet's transitivity choices systematically selecting against the readings contrasted by the other.

The study makes two contributions. Theoretically, it operationalizes framing theory from the bottom up, recovering frames from grammatical selection rather than imposing pre-defined categories — and thereby addressing the operationalization problem long noted in the framing literature (Matthes, 2009; de Vreese, 2005). Methodologically, the study demonstrates that frame divergence can be encoded at the level of grammatical role while surface evaluation registers convergence: both outlets adopt a procedural register and cite recognizable sources, yet the underlying frame packages are structurally inverse (Brewer et al., 2003; Wanta et al., 2004). Transitivity analysis, applied to verbal collocates of the focal actor, offers a route to recovering this layer of divergence in comparative media research.

Two limitations should be acknowledged. First, the analysis is restricted to two outlets in a single language. Second, the manual classification of process types, though triangulated through concordance evidence and double-coded with substantial inter-rater agreement, retains interpretive biases that cannot be fully eliminated. Future research could extend this framework to additional outlets and to multilingual comparisons. It would also be productive to connect the framing patterns identified here to scholarship on discourse planning (Yu & Luo, 2023), examining whether the systematic coherence of People's Daily's framing reflects strategically planned production at the institutional level — a question that lies beyond the textual evidence presented here but is suggested by it.

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